

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

|                              |   |                       |
|------------------------------|---|-----------------------|
| WILLIAM C. TOTH JR., ET. AL. | : | No. 1:22-cv-00208-JPW |
|                              | : |                       |
| Plaintiffs                   | : |                       |
|                              | : |                       |
| v.                           | : |                       |
| LEIGH M. CHAPMAN, ET. AL.    | : |                       |
|                              | : |                       |
| Defendant                    | : |                       |

---

DECLARATION OF AARON BASHIR

Under 28 U.S.C. § 1746, I, Aaron Bashir, make this declaration as follows:

1. I am a Philadelphia Republican City Committee endorsed candidate for United States Congress for the Second Congressional District of Pennsylvania.
2. The incumbent in the Second Congressional District is Brendan Boyle, a Democrat.
3. According to registration records, the Second Congressional District has a +44% Democratic voter-registration advantage.<sup>1</sup>
4. The Pennsylvania Supreme Court's order of February 23, 2022, inflicts irreparable harm by forcing me to run in a congressional district with a massive Democratic voter-registration advantage, rather than in a statewide at-large election where the number of Democratic and Republican voters are more evenly split.

---

<sup>1</sup> [https://projects.fivethirtyeight.com/redistricting-2022-maps/pennsylvania/preliminary\\_plan](https://projects.fivethirtyeight.com/redistricting-2022-maps/pennsylvania/preliminary_plan) (last visited February 24, 2022)


5. The Pennsylvania Supreme Court's order of February 23, 2022, inflicts additional irreparable harm because the court-drawn map is unconstitutional under the Elections Clause and 2 U.S.C. § 2a(c)(5), and there is a serious risk that a federal court or the Supreme Court of the United States will declare the map unlawful after I have spent time and resources campaigning in the court-drawn congressional district. Preliminary-injunctive relief is needed to remove this uncertainty.

6. The lingering uncertainty over the legality and constitutionality of the court-drawn map inflicts additional irreparable harm by making it difficult to raise money from donors to finance my campaign.

7. Many donors want to know the particulars of a race before committing financial resources to it. Yet it remains unclear whether the court-imposed map will be used for the 2022 elections because the state supreme court's order of February 23, 2022, is patently unconstitutional and is likely to be declared so at the conclusion of this litigation or in other lawsuits or appeals that challenge the legality of the state supreme court's actions.

8. Without financial resources, I cannot finance my campaign and my ability to broadcast my campaign message to voters is greatly diminished as I cannot pay staff, purchase advertising, and print campaign literature.

9. I declare, certify, verify, and state under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
Aaron Bashir (Feb 24, 2022 20:47 EST)

AARON BASHIR

Date: Feb 24, 2022